

HONORABLE ROBERT S.LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ESTRALITTA TOWNSLEY,

Plaintiff,

v.

GEICO INDEMNITY COMPANY, an
insurance company,

Defendant.

NO. 12-cv-01909-RSL

**STIPULATION AND
ORDER REGARDING EXPERT
DISCLOSURES**

I. STIPULATION

Come now the parties, by and through their undersigned counsel of record, and hereby stipulate to and respectfully request that the Court enter an order extending the May 8, 2013 FRCP 26(a)(2) expert disclosure and report deadline to June 7, 2013. The parties also request that the deadline for disclosure of rebuttal experts be set for June 21, 2013.

This claim arises out of an underinsured motorist and extra-contractual dispute with Geico for alleged failure to negotiate in good faith with the plaintiff who was injured by an

STIPULATION FOR AND PROPOSED
ORDER RE: EXPERT DISCLOSURES
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1 underinsured driver in an automobile collision on May 4, 2010 within King County,
2 Washington. Plaintiff Townsley initially brought suit in King County Superior Court against
3 Geico, her UIM insurer.

4 Geico has declined to resolve this matter via arbitration. Geico's insurance contract is a
5 contract of adhesion as it relates to resolving UIM disputes or disagreements and provides that
6 "binding, voluntary arbitration ... shall be composed of a single arbitrator selected by mutual
7 agreement ... [unless] agreement [could not] be reached on selection of an arbitrator."

8
9 Geico removed this case from King County Superior Court to United States District
10 Court, Western District of Washington, at Seattle.

11 The parties believe that extending the expert report deadline to June 7, 2013 and the
12 rebuttal expert deadline to June 21, 2013 will allow adequate time to schedule any depositions
13 and complete expert reports.

14 DATED this 17th day of April, 2013.

15 SCOTT M. DONALDSON, P.S.

16 WILSON SMITH COCHRAN DICKERSON

17
18 s/ Scott M. Donaldson

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Attorney for Defendant

II. ORDER

THIS MATTER coming on to be heard before the undersigned judge of the above-entitled Court based upon the foregoing stipulation of the parties, and the Court being fully advised in the premises,

IT IS SO ORDERED that the parties shall comply with the following deadlines for the FRCP 26(a)(2) expert disclosures:

All parties to provide Expert Witness Disclosures/Reports by June 7, 2013. The deadline for disclosure of rebuttal experts is June 21, 2013.

DATED this 23rd day of April, 2013.



Robert S. Lasnik
United States District Judge

Presented by:

SCOTT M. DONALDSON, P.S.

WILSON SMITH COCHRAN DICKERSON

s/ Scott M. Donaldson

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